

At some time after speaking with Ickes, and by no later than May 18, Jennifer O'Connor called Interior.³¹⁹ As a result of her relationship with Collier, she believes that she likely reached out to him initially. She thinks that Collier, in turn, is likely the person who put her in touch with Heather Sibbison.³²⁰

1) Jennifer O'Connor's May 18, 1995, Memo

Jennifer O'Connor believes that her first telephone conversation with Heather Sibbison most likely took place on May 18, 1995, or perhaps the preceding day.³²¹ As reflected in a memorandum to Ickes she wrote on May 18, O'Connor asked Sibbison about the status of the Hudson application. O'Connor believes that at the beginning of the conversation she said she was calling on behalf of Ickes only to make a status inquiry about the pending matter, and was not calling to affect the decision in any way. O'Connor states that this was her standard practice in dealing with departments or agencies. In her first interview with this office, Jennifer

³¹⁹Jennifer O'Connor acknowledges that she received a copy of Patrick O'Connor's May 8 letter to Ickes sometime before she spoke with Sibbison. Neither Jennifer O'Connor nor Ickes, however, can recall when or from whom she received it.

³²⁰Collier said he did not think he knew who Jennifer O'Connor was at that time, except that he would have known from her telephone number that she worked at the White House. He said he would not have delegated responsibility to return her call without knowing the reason for her call, but he has no recollection of speaking to her and speculated that he may have had his secretary ask why she was calling. He said he probably would have delegated a question like the status of Hudson to John Duffy, who in turn would delegate it to Sibbison. Sibbison said Duffy asked her to return Jennifer O'Connor's call.

³²¹Circumstances suggest that the timing of Ms. O'Connor's call may have been effected by O'Connor & Hannan communications to Ickes around May 16. Schneider had approached Ickes about the Hudson matter at the Mayflower on the evening of May 16, and Ickes told him that he would look into the matter. Over the course of that same day and the one before it, Patrick O'Connor had placed five telephone calls to Ickes, none of which appear to have resulted in his getting through to Ickes. Records indicate that Ickes's administrative assistant informed Jennifer O'Connor of these calls, though she does not recall being aware of them.